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May 7, 2002

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Mr. Chip Humphrey
EPA Region 10, Portland Office
811 SW Sixth Ave.
Portland, OR 97204

Re: Proposed analytical concentration goals for the Portland Harbor
Superfund site.

Dear Chip:

We appreciate receipt of the Lower Willamette Group's document, "Analytical Concentration Goals for Target Analytes in Sediment, Tissue and Water Samples", and the opportunity to review it. We feel that this early communication and sharing of information is to the benefit of all parties involved in this process. Based on our review, Willamette Riverkeeper has several comments.

Generally speaking we believe that the proposed approaches for developing screening values for sediment, surface water, groundwater and protection of ecological receptors are sufficiently conservative for purposes of identifying analytical goals. Most of the comments are procedural in nature. The provision of some of the additional supporting documentation would assist in a more thorough review.

1. The screening exercise should be preceded by an evaluation of detection limits. If detection limits are not sufficiently low, a nondetect value can be misleading. All constituents whose detection limits exceed the screening criteria should be retained at $\frac{1}{2}$ the detection limit.
2. Once the detection limits have been determined to be sufficiently low, a chemical can be eliminated if there is sufficient evidence that it has not been detected. A minimum of 20 samples is needed to demonstrate a 5% frequency of detection (1/20). Where a small number of samples have been taken (e.g. 1, 4, 10) elimination based solely on frequency of detection cannot be adequately established. These chemicals should be retained and screened at $\frac{1}{2}$ the detection limit in the chemical screening exercise.

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3. The most conservative value for fish tissue protective of human health is derived from the Native American Scenario. A fish consumption value of 540 g/kg for the Native American Fisher was developed by Barbara Harper (Yakima Nation) and Stuart Harris (Confederated Tribes of the Umatilla Indian Reservation-CTUIR). This value has been used in other risk analyses and would be more conservative.
4. It is unclear why a lower fish intake rate is used in the noncancer calculations. (See Tables C-4, C-5) Whether the CRITFC value or the Harris-Harper value is used, it should be consistent in the two intake equations.
5. Additional documentation should be provided such as the fraction organic carbon, biota to sediment accumulation factor (BSAF) and other inputs used to calculate fish tissue concentrations from sediment.

We feel that the points mentioned above are important considerations in ensuring a technically sound approach and consistency with the State of Oregon chemical screening protocol and the risk assessment approach required for the uplands work.

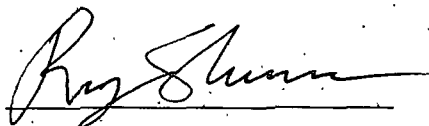
We look forward to talking with you about these comments further, please feel free to contact me at the Willamette Riverkeeper office at (503) 223-6418, or feel free to call Regina Skarzinskas at (503) 641-0230. Again, we appreciate this opportunity to begin constructive communication on these technical issues at this stage in the process.

Best Regards,



Travis Williams

Riverkeeper & Executive Director



Regina Skarzinskas, MPH

Technical Assessment Services

Cc: Dan Opalski, EPA
Wallace Reid, EPA
Kim Cox, DEQ